

	Comments Received as of November 15, 2013									
	Comments neceived as of November 13, 2013									
Council/ Public	Commenter	Comment	Response	Topic						
Public	Submitted by Ms. Cathleen OKeefe	Fresenius Medical Care North America appreciates the opportunity to provide comment to the expert panel's recommendation on amending NQF # 0255 Measurement of Serum Phosphorus Concentration. We strongly support the panel's recommendation that the measure be amended to include either remove "serum" phosphorus or add "heparin plasma" to the specifications. Our experience has demonstrated that serum and plasma phosphorus test results are comparable. Additionally, the specimen processing of plasma requires fewer manipulations (centrifuging) and less blood, and produces a more stable specimen. Finally, we anticipate that future adoption of plasma measurement may decrease the incidence of hemolysis associated with premature centrifugation of blood samples, thus decreasing the burden and clinical impact of repeated blood draws in a largely anemic population, and improving overall health care system efficiency. We greatly appreciate the efforts of the panel in considering the equivalence between serum and heparin plasma phosphorus, and in reaching this conclusion and recommendation.	Supports recommendation - no response needed."	0255: Measurement of Serum Phosphorus Concentration						
HPL	Submitted by Ms. Carmella Bocchino, MBA, RN	We support revising this measure to allow for testing plasma phosphorus concentration as an acceptable alternative to serum phosphorus.	Supports recommendation - no response needed."	0255: Measurement of Serum Phosphorus Concentration						
Public	Norma Gomez, ANNA; Submitted by Norma J. Gomez, MBA, MSN, RN, CNN	The American Nephrology Nurses Association (ANNA) promotes excellence in and appreciation of nephrology nursing so we can make a positive difference for people with kidney disease. We are the only professional association that represents nurses who work in all areas of nephrology. ANNA has a membership of approximately 10,000 registered nurses that practice in all areas of nephrology, including hemodialysis, chronic kidney disease,	Supports recommendation - no response needed."	0255: Measurement of Serum Phosphorus Concentration						

		peritoneal dialysis, acute care, and transplantation. Most of our members work in freestanding dialysis units, hospital outpatient units, and hospital inpatient dialysis units.  ANNA appreciates the efforts of the Expert Panel convened by NQF to include the voice of nursing. As a new member of NQF, we appreciate the opportunity to respond to Measure 0255. ANNA supports the expert panel's recommendation that Measure 0255 be amended to include either serum or heparin plasma phosphorus testing. The terms heparinized plasma and serum are used interchangeably in the nephrology community. The evidence shows there is a minimal difference in the results between the two methods and therefore does not impact on patient care.		
HPR	Robert Kossmann, MD, Renal Physicians Association; Submitted by Ms. Amy Beckrich	The Renal Physicians Association (RPA) strongly supports the expert panel's recommendation that Measure 0255 be amended to include either serum or heparin plasma phosphorus testing – i.e., remove "serum" or add "heparin plasma" to the specifications. RPA believes this is the correct approach, as the majority of values reported as "serum" phosphorus in the dialysis population are actually measured in heparinized plasma. To do otherwise would require that a separate tube of blood be obtained which is neither clinically reasonable nor rational approach to patient care and cost. This is an issue of clinical procedure and strict terminology rather than a quality of care issue. In practice, the terms heparinized plasma and serum are used interchangeably.  RPA is the professional organization of nephrologists whose goals are to insure optimal care under the highest standards of medical practice for patients with renal disease and related disorders. RPA acts as the national representative for physicians engaged in the study and management of patients with renal disease.	Supports recommendation - no response needed."	0255: Measurement of Serum Phosphorus Concentration
QMRI	Linda DeRuvo- Keegan, Kidney Care Partners; Submitted by Dr. Lisa McGonigal, MD, MPH	Kidney Care Partners (KCP) is an alliance of members of the kidney care community that serves as a forum for patient advocates, dialysis care professionals, providers, and manufacturers to advance policies that support the provision of high quality care for individuals with both chronic kidney disease and End-Stage Renal Disease (ESRD). An NQF member, we have been active participants in NQF's projects on ESRD quality and commend you for your work in this regard. In December 2012, we requested an ad hoc review of NQF 0255: Measurement of Serum Phosphorus Concentration.	Supports recommendation - no response needed."	0255: Measurement of Serum Phosphorus Concentration

		request and supports the Panel's recommendation that the measure be amended to include either serum or heparin plasma phosphorus testing.		
QMRI	Linda DeRuvo- Keegan, Kidney Care Partners; Submitted by Dr. Lisa McGonigal, MD, MPH	Kidney Care Partners (KCP) is an alliance of members of the kidney care community that serves as a forum for patient advocates, dialysis care professionals, providers, and manufacturers to advance policies that support the provision of high quality care for individuals with both chronic kidney disease and End-Stage Renal Disease (ESRD). An NQF member, we have been active participants in NQF's projects on ESRD quality and commend you for your work in this regard. In December 2012, we requested an ad hoc review of NQF 0255: Measurement of Serum Phosphorus Concentration.	Supports recommendation - no response needed."	General Draft
		KCP greatly appreciates the efforts of the Expert Panel convened by NQF to address our request and supports the Panel's recommendation that the measure be amended to include either serum or heparin plasma phosphorus testing.		